



ENVIRONMENTAL CONSULTANTS



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Ms. Margaret Gielniewski
USEPA Region 5 – SR-6J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

October 15, 2014
(1530)

RE: September 2014 Monthly Progress Report
Manitowoc Former MGP, Manitowoc, Wisconsin
Wisconsin Public Service Corporation

CERCLA Docket No. V-W-06-C-847
Site Spill ID – B5BW
CERCLIS ID – WIN000509949

Dear Ms. Gielniewski:

On behalf of Integrys Business Support, LLC (IBS), Natural Resource Technology, Inc. (NRT) is providing this Monthly Progress Report for Wisconsin Public Service Corporation's (WPSC) Manitowoc Former Manufactured Gas Plant (MGP) Site.

1) Progress Made During the Past Month

- Participated in a meeting with USEPA and WDNR on September 8, 2014 to discuss Dave Mount's memo with comments on the risk breakpoint for sediment delineation.

2) Analytical and Other Testing Results Received

- Soil gas analytical results have been summarized and attached to this report. Note the parent sample results from the shallow soil gas probe were rejected as described in the validation report: "Examination of the analytical sequence shows the sample run before 080414001 was analyzed at a 500x dilution. Given the relatively high levels observed in the prior sample, the likelihood of sample carry over is high and would explain the apparent disagreement between the duplicate pair. Therefore all [TO-15] results for sample 080414001 will be qualified as rejected ("R")." The duplicate result is still valid.

3) Projected Work Next Month

IBS Actions

- Prepare RI Report Revision 1 that incorporates upland and sediment comments discussed in the August and September meetings. Proposed deliverable date of October 23, 2014.
- Prepare alternatives array following review of agency comments on RI Report Rev 0.

USEPA Actions

- Provide IBS with Dave Mount's calculations of an alternative risk threshold for site sediments.

4) Anticipated Schedule

A schedule for site-specific work activities was provided in the SSWP with general milestone dates below.

Deliverable or Milestone	Target Date	Actual Date
SSWP Revision 0	Original date of March 5, 2007, revised to May 15, 2007. Second revised due date of June 5, 2007.	June 5, 2007
Respond to USEPA Completion Report Comments	July 2007	July 25, 2007
Obtain SSWP Revision 0 Comments from USEPA	---	February 11, 2008
Respond to USEPA Comments and submit SSWP Revision 1	March 27, 2008, revised to April 10, 2008	April 10, 2008
USEPA Initially Approved Work Plan Items - bathymetric survey	June 2008	Week of June 9, 2008
Obtain SSWP Revision 1 Comments from USEPA	---	September 29, 2008
Sediment		
Step I Sediment Sampling, sediment poling, surface water sampling	Week of November 3, 2008	Nov. 3-7 and Nov. 13, 2008
Receive all Step I analytical and toxicity testing data	End of December 2008/Beginning of January 2009	January 2009
Step I Data Validation Completion	End of February 2009	February 28, 2009
Step I Data Interpretation/Memo	August 2009	August 19, 2009
Step II RI Activities Pre-Scoping Meeting	---	November 3, 2009
Step II Sediment Work Plan to USEPA	January 2010	December 23, 2009
Obtain Step II Sediment Sampling Comments from USEPA	--	December 3, 2010
Respond to USEPA Comments on Step II Sediment Sampling Work Plan	January 18, 2011	January 18, 2011
Conference call with USEPA on critical issues		September 28, 2011
Received Conditional Approval of the Step II Sediment Work Plan from USEPA		October 25, 2011
Submit Step II Sediment Work Plan (Revision 1)	January 31, 2012	January 31, 2012
Obtain Step II Sediment Sampling Plan (Rev 1) Comments from USEPA	--	February 24, 2012 (draft) March 14, 2012 (formal letter)
Respond to USEPA Comments on Step II Sediment Sampling Work Plan (Rev 1) and Prepare Work Plan (Rev 2)	April 30, 2012	April 30, 2012
Received Approval from USEPA of Step II Sediment Work Plan (Rev 2)		June 6, 2012
Perform Step II Sediment Sampling	August 20, 2012	August 20 to Sept. 13, 2012

Deliverable or Milestone	Target Date	Actual Date
Submit Step II Risk Assessment Technical Memorandum		March 11, 2014
Meeting to discuss Sediment RI Rev 0 comments	September 8, 2014	September 8, 2014

Deliverable or Milestone	Target Date	Actual Date
Upland RI		
Upland RI field work	Scheduled for September 14 through 25, 2009	September 14 through 23, 2009
First Quarterly Round of Groundwater Monitoring	October 2009	October 26 & 27, 2009
RI Upland Soil Data Validation Completion	January 2010	January 4, 2010
RI Upland Groundwater (1 st round) Data Validation Completion	February 2010	January 21, 2010
Second Quarterly Round of Groundwater Monitoring	January 26 & 27, 2010	January 26 & 27, 2010
Third Quarterly Round of Groundwater Monitoring	April 2010	April 27 & 28, 2010
RI Upland Groundwater (2nd round) Data Validation Completion	May 2010	May 26, 2010
Submit Technical Memorandum for Supplemental RI Activities to USEPA	July 2010	Submitted on July 16, 2010
Fourth Quarterly Round of Groundwater Monitoring	Late July 2010	July 26 & 27, 2010
Post-RI Semi-Annual Groundwater Monitoring	November 2010	November 2 & 3, 2010
Respond to comments on Technical Memorandum No. 3 for supplemental RI activities	January 28, 2011	January 28, 2011
Post-RI Semi-Annual Groundwater Monitoring	May 2011	May 17 & 18, 2011
Conference call with USEPA on critical issues for Supplemental RI		September 28, 2011
Perform Post-RI Semi-Annual Groundwater Monitoring	November 2011	November 1 & 2, 2011
Received Conditional Approval of the Technical Memorandum No. 3		November 10, 2011
Submit Technical Memorandum No. 3 (Revision 1) for supplemental RI	January 31, 2012	January 30, 2012
Obtain Technical Memorandum No.3 (Rev 1) Comments from USEPA	--	February 24, 2012 (draft) March 14, 2012 (formal letter)
Respond to comments on Technical Memorandum No. 3 (Rev 1) for supplemental RI activities and Prepare Tech Memo No. 3 (Rev 2)	April 30, 2012	April 30, 2012
Obtain Technical Memorandum No. 3 (Rev 2) Comments from USEPA		June 6, 2012



Deliverable or Milestone	Target Date	Actual Date
Upland RI		
Received USEPA approval of Technical Memorandum No. 3 (Rev 2)		July 12, 2012
Post-RI Groundwater Monitoring	August 2012, November 2012, February 2013, May 2013	Aug 8, 2012; Nov 14, 2012; Feb 27, 2013, May 30 2013
Perform Supplemental RI Activities	July 2012, pending USEPA approval of Tech Memo No. 3 (Rev 2)	July 30 th to August 2 nd 2012
Submit Technical Memorandum No. 4 Supplemental Activities - VI	December 2012	December 5, 2012
Receive USEPA comments on Technical Memorandum No. 4	December 2012	December 27, 2012
Respond to comments and issue Technical Memorandum No. 4 (Rev1)	January 2013	January 14, 2013
Receive approval of Technical Memorandum No. 4 (Revision 1)	January 2013	January 22, 2013
Complete supplemental VI presented in Technical Memorandum No. 4	June 2013	Indoor air - June 1, 2013, soil vapor June 15th
Complete RI pre-scoping meeting	Mid-October 2013	November 13, 2013
Resume Semi-annual Groundwater Monitoring	November 2013, May 2014, November 2014	Nov 13, 2013
Receive USEPA comments on upland pre-scoping meeting	November 27, 2013	November 27, 2013
Issue response to comments on upland pre-scoping meeting	December 2013	January 13, 2014
Conference call with USEPA and WDNR to discuss further VI sampling at the Winter Building	January 30, 2014	January 30, 2014
Receive USEPA response to IBS response to comments	February 7, 2014	February 21, 2014
Complete Indoor Air and Soil Gas Sampling on Winter Property	March 3, 2014	March 3, 2014
Complete RI report revision 0	May 23, 2014	May 23, 2014
Complete supplemental upland soil boring and soil vapor probe installation	June 23, 2014	June 23, 2014
Receive USEPA comments on RI Report revision 0	July 28, 2014	July 14, 2014
Collect soil gas samples from supplemental vapor probes	August, 2014	August 4, 2014
Meeting to discuss upland RI comments	August 25, 2014	August 25, 2014
Complete RI Report Revision 1	October 23, 2014	
Submit addenda with supplemental RI soil and vapor data	TBD – following receipt of validated results	

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5) Problems or Potential Problems Encountered

- None.

6) Actual or Planned Resolution of Problems or Potential Problems

- None.

If you have any questions regarding the content of this progress report, please contact Mr. Naren Prasad of IBS at 312.240.4569.

Sincerely,

NATURAL RESOURCE TECHNOLOGY, INC.

A handwritten signature in black ink, appearing to read "B. Hennings".

Brian G. Hennings, PG
Hydrogeologist/Project Manager

A handwritten signature in black ink, appearing to read "Jennifer M. Hagen".

Jennifer M. Hagen, PE
Senior Engineer

cc: Mr. Kevin McKnight, WDNR (via US Mail and email)
Mr. Naren Prasad, IBS (via email)
Ms. Catherine Schripsema, CH2M Hill (via email)

encl: Validated August 2014 Soil Gas Sample Results

[1530 September 2014 WPSC Manitowoc 141015.doc]

Validated August 2014 Soil Gas Sample Results
 Wisconsin Public Service Corporation-Manitowoc Former MGP, Manitowoc, Wisconsin
 CERCLIS ID:WIN000509949

Location	Sample Date	1,2,4-Trimethylbenzene (ug/m3)	Benzene (ug/m3)	Ethylbenzene (ug/m3)	Naphthalene (PAH) (ug/m3)	Toluene (ug/m3)	Xylene, o (ug/m3)	Xylenes, m + p (ug/m3)	Xylenes, Total (ug/m3)	Carbon Dioxide (mol percent)	Methane (mol percent)	Oxygen (mol percent)
080414001 SV123	8/4/2014	4.2 R	2.2 R	6.5 R	0.97 R	10 R	7.5 R	28 R	36 R	1.04	< 0.1 U	15.9
080414002 QC01 SV123	8/4/2014	3.8	< 1.2 U	< 1.6 U	1.2	3.1	< 1.6 U	< 3.2 U	< 4.8 U	1.02	< 0.1 U	16
080414003 SV123D	8/4/2014	< 1.8 U	1.5	< 1.6 U	2.8	13	< 1.6 U	< 3.2 U	< 4.8 U	0.86	< 0.1 U	14.3

10: AJS/TFB 10/09/14

Notes:
 U = Not detected
 R = Rejected by Validator
 QC = Quality control sample
 ug/m3 = micrograms per cubic meter
 < = less than